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ALEXANDRIA MEDICAL SOCIETY, INC.

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CLINICAL INSTRUCTOR
GEORGETOWN UNIVERSITY SCHOOL OF MEDICINE

MICHAEL C. TRAHOS, D.O.
GENERAL MEDICINE/FAMILY PRACTICE

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of)
)
The Development of Operational,)
Technical, and Spectrum)
Requirements for Meeting)
Federal, State and Local Public)
Safety Agency Communications)
Requirements Through the)
Year 2010)

WT Docket No. 96-86

REPLY COMMENTS

Submitted by:

Dr. Michael C. Trahos, D.O., NCE, CET
4600 King Street, Suite 4E
Alexandria, Virginia 22302-1213

December 19, 1996

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GENERAL MEDICINE/FAMILY PRACTICE



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Dr. Michael C. Trahos, D.O., NCE, CET
4600 King Street, Suite 4E
Alexandria, Virginia 22302-1213

December 19, 1996

I.

INTRODUCTION

1. Dr. Michael C. Trahos, D.O., NCE, CET (Commenter), pursuant to 47 CFR 1.415 of the Federal Communications Commission's (Commission) rules, hereby submits these timely filed **REPLY COMMENTS** to this proceeding.

II.

REPLY COMMENTS

2. On February 21, 1996 (Attachment A) and July 10, 1996 (Attachment B), this Commenter filed comments in response to the Public Safety Wireless Advisory Committee's (PSWAC) Interoperability Subcommittee's (ISC) draft reports. On February 29, 1996, the PSWAC/ISC met and reviewed this Commenter's February 21, 1996 submission.

3. Pursuant to the minutes of the Fifth Meeting of the PSWAC/ISC, this Commenter's submission noted above was to be "attached to the final ISC report as a minority opinion." (Report No. PSWAC/ISC 96-02-021, page 8). However, review of both the Commission released written Part I and complete CD-ROM versions of the Final PSWAC Report have failed to include this submission. Furthermore, the Final PSWAC Report CD-ROM version was mailed to all PSWAC participants on December 5, 1996 (Attachment C), two days post closure of the comment filing date to this proceeding.

III.

CONCLUSION

4. The Final PSWAC Report has been included into the official record of this proceeding. This Commenter hereby re-submits the documents noted in paragraph 2 supra to complete the Final PSWAC Report. Their formal inclusion into this proceeding is in the public interest.

Respectfully submitted,


Dr. Michael C. Trahos, D.O., NCE, CET

MCT/mct

ATTACHMENT A

PRESIDENT (CY '94)
ALEXANDRIA MEDICAL SOCIETY, INC.

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Before the
FEDERAL COMMUNICATIONS COMMISSION
WIRELESS TELECOMMUNICATIONS BUREAU
PRIVATE WIRELESS DIVISION
Washington, DC 20554

In the Matter of)
)
Public Safety Wireless Advisory)
Committee (PSWAC);)
Interoperability Subcommittee:)
)
Definition of Public Safety/)
Public Services)

WTB-1

PSWAC/ISC 95-12-051/3

COMMENTS

Submitted by:

Dr. Michael C. Trahos, D.O., NCE, CET
4600 King Street, Suite 4E
Alexandria, Virginia 22302-1213

February 21, 1996



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CLINICAL INSTRUCTOR
GEORGETOWN UNIVERSITY SCHOOL OF MEDICINE

MICHAEL C. TRAHOS, D.O.
GENERAL MEDICINE/FAMILY PRACTICE

Before the
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WIRELESS TELECOMMUNICATIONS BUREAU
PRIVATE WIRELESS DIVISION
Washington, D.C. 20554

In the Matter of)	
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Public Safety Wireless Advisory)	WTB-1
Committee (PSWAC);)	
Interoperability Subcommittee:)	
)	PSWAC/ISC 95-12-051/3
Definition of Public Safety/)	
Public Services)	

COMMENTS

Submitted by:

Dr. Michael C. Trahos, D.O., NCE, CET
4600 King Street, Suite 4E
Alexandria, Virginia 22302-1213

February 21, 1996

I.

INTRODUCTION

1. Dr. Michael C. Trahos, D.O., NCE, CET (Commenter), pursuant to the Federal Communications Commission's (Commission) co-sponsored Public Safety Wireless Advisory Committee (PSWAC) (C-ID #2016) Charter (Attachment C), hereby submits these Comments in response to the PSWAC's Interoperability Subcommittee (ISC)/Steering Committee approved "Definition of Public Safety/Public Services" (Attachment A).1/

II.

COMMENTER QUALIFICATIONS

2. Commenter is a licensed and actively practicing **General Medicine/Family Practice Physician and Surgeon**. Commenter holds the academic faculty appointments of **Clinical Professor of Medicine** from Ross University School of Medicine and **Clinical Instructor**, Department of Family Medicine, Georgetown University School of Medicine. Commenter holds the current position of **Chairman - Legislative Affairs Committee** and was **President (CY '94)** of the Alexandria [Virginia] Medical Society (AMS), was **Vice-Councilor (FY '95)** - 8th U.S. Congressional District of the Medical Society of Virginia (MSV), is **Chairman - Legislative Affairs Committee** of the District of Columbia Osteopathic [Medical] Association, was **Vice-President (FYs '89-90)** of the Virginia [State] Osteopathic Medical Association (VOMA), is **VOMA Virginia State Delegate** to the [National] American Osteopathic [Medical] Association (AOA) House of Delegates and **VOMA Federal Representative** to the AOA Council on Federal Health Programs.

3. Commenter was selected/elected and currently serves as the **"Medical Profession" Representative** on the Technical Committee, **Chairman - Legislative/Regulatory Affairs Committee** and **Special Emergency Radio Service Representative** on the RPRC of the National Public Safety Planning Advisory Committee's (NPSPAC) Region-20 [State of Maryland, Washington, DC and Northern Virginia] Public

Safety Plan Review Committee (RPRC), for the development and implementation of a Public Safety National/Regional Plan (General Docket No. 90-7) for the use of the 821-824/866-869 MHz bands by the Public Safety Services pursuant to the Report and Order in General Docket No. 87-112.

4. Commenter is a certified **First Class Telecommunications Engineer**, with expertise endorsements in Administrative/Regulatory, Antenna Systems, Broadcast AM, Frequency Coordination and Land Mobile Systems, certified by the National Association of Radio and Telecommunications Engineers (NARTE), and possessor of a **First Class Certificate of Competency**, issued by the Association of Public-Safety Communications Officers (APCO). Commenter is a **FELLOW** of The Radio Club of America. Commenter has over twenty years experience in the telecommunications field with many of these years spent actively participating in Commission proceedings.

5. Commenter is licensed in the Amateur Radio Service (ARS), the Business Radio Service (BRS), the General Mobile Radio Service (GMRS) and Special Emergency Radio Service (SERS). Commenter has/is serving as a voluntary frequency/CTCSS/DCS GMRS coordinator for the Washington, D.C. Metropolitan area. It is with having the above extensive expertise in dealing with personal, business, medical and emergency/public assistance communications matters that this Commenter is qualified to make the following Comments.

III.

COMMENTS

6. Pursuant to the PSWAC Charter, the scope of activity and objectives of this Committee is to "provide advise and recommendations to the Chairman, Federal Communications Commission (FCC) and the Administrator, National Telecommunications and Information Administration (NTIA) on operational, technical, and spectrum requirements of Federal, state, and local public safety entities through the year 2010."2/ It is to further "[a]dvice the NTIA and FCC on options to provide for greater interoperability among Federal, state, and local public safety entities."3/

7. On December 15, 1995, the PSWAC Steering Committee approved the ISC document entitled "Definition of Public Safety/Public Services".4/ In defining Public Safety/Public Services, the ISC has restricted the definition of Public Safety Services to those services only "rendered by or through Federal, State, or Local government entities" (Emphasis added) and Public Safety Services Provider/Support Provider to only those entities that are "properly authorized by the appropriate (Public Safety) governmental authority"5/ (Emphasis added). These restrictive definitions fail to take into account recent Commission proceedings that further define Public Safety Services/Support Providers as those provided by entities not related to or requiring Public-Safety governmental authority authorization.

8. The issue of defining who is a "public safety authority"6/ or public "safety-of-life" entity 7/ has been debated within Commission proceedings since 1987. It began with GN Docket No. 87-112 and has recently been concluded with the adoption of the Emergency Medical Radio Service (EMRS) Memorandum Opinion and Order in PR Docket No. 91-72 (EMRS M,O&O) on January 18, 1996.

9. Shortly after the adoption of the Report and Order in GN Docket Nos. 84-1231, 84-1233, and 84-1234 8/ which allocated the 821-824/866-869 MHz bands to Public Safety, the Commission adopted a Notice of Proposed Rule Making, GN Docket No. 87-112, to establish service rules and technical standards for the use of these newly allocated bands (821 MHz Notice). In the 821 MHz Notice, the Commission proposed to define "public safety authorities" as being those entities licensed in the Public Safety Radio Services (PSRS) under 47 CFR Part 90, Subpart B and SERS under 47 CFR Part 90, Subpart C. After the extensive review of comments and replies regarding this issue, the Commission concluded that their proposed defining of "public safety authorities" as meaning PSRS and SERS eligibles was correct, sighting that PSRS and SERS are "both involved with public safety", and issued the Report and Order in GN Docket No. 87-112 (821 MHz Order) adopting this definition.9/

10. Also in 1987, the Commission adopted a Notice of Proposed Rule Making, GN Docket No. 87-14, to reallocate the 220-222 MHz band from secondary ARS to primary narrowband commercial and public safety use.10/ Shortly after the adoption of the Report and Order in GN Docket No. 87-14 reallocating this band 11/, the Commission adopted a Notice of Proposed Rule Making, PR Docket No. 89-552, to provide for the use of this new band.12/

11. In the Report and Order to GN Docket No. 89-552, the Commission adopted a band plan for 220-222 MHz which included a 10 channel Public Safety/Mutual Aid set aside, but allowing only those public safety entities eligible under 47 CFR Part 90, Subpart B access to these frequencies.13/ In response to a Petition for Reconsideration questioning the exclusion of select 47 CFR Part 90, Subpart C SERS eligibles from these new 220-222 MHz Public Safety/Mutual Aid channels 14/ (220 MHz Reconsideration), the Commission adopted a Memorandum Opinion and Order in PR Docket No. 89-552 15/ (220 MHz M,O&O) electing to defer this issue to a then recently enacted Notice of Proposed Rule Making, PR Docket No. 91-72, to create a new EMRS.16/

12. Upon adoption of the Report and Order in PR Docket No. 91-72 (EMRS Order), the Commission inadvertently omitted addressing the deferred 220 MHz Reconsideration issue, as noted in paragraph 11 supra, as stated would be done pursuant to the 220 MHz

M,O&O. Upon release of the EMRS Order, a further Petition for Reconsideration 17/ (EMRS Reconsideration) was filed again raising the same issue addressed in the 220 MHz Reconsideration.

13. In comments filed in response to the EMRS Reconsideration, the International Municipal Signal Association/International Association of Fire Chiefs, Inc. (IMSA/IAFC) claimed that the purpose of the EMRS proceeding was to "disentangle emergency medical communications from other SERS eligibles", to "provide "Public Safety" recognition to this user community in recognition of its function and communications needs", and to apparently "cure" a definable injustice to EMRS (47 CFR Part 90, Subpart B) eligibles.18/ Upon adopting the EMRS Order, it was perceived that the Commission had appropriately redefined Public Safety authorities/safety-of-life eligibles as 47 CFR Part 90, Subpart B entities only and essentially deleting all non-EMRS SERS (47 CFR Part 90, Subpart C) entities from 821 MHz Order definition.

14. In reply to IMSA/IAFC's comments, this Commenter presented substantiative supportive arguments that non-EMRS eligible SERS entities, under 47 CFR Part 90 Subpart C [§§ 90.35 (physicians/hospitals), 90.37 (rescue organizations), 90.41 (disaster relief organizations), and 90.45 (beach patrols)], during emergencies and disasters do "perform the exact function and have

interoperability communications needs equal to their EMRS counterparts."19/ In the EMRS M,O&O, the Commission agreed with this Commenter's assertions and appropriately amended 47 CFR 90.720 to reflect their inclusion because of the correct assessment that it would "serve the public interest by enhancing interoperability between many types of emergency providers in safety-of-life situations."20/

IV.

CONCLUSION

15. With adoption of the EMRS M,O&O, the Commission has essentially refined the 821 MHz Order definition of Public Safety authorities/safety-of-life entities to now mean those eligible under 47 CFR Part 90 Subpart B (PSRS) and Subpart C (SERS under §§ 90.35, 90.37, 90.41 and 90.45). Nowhere in the Commission's rules is it required that these entities be properly authorized by an appropriate governmental authority, whose primary mission is in providing public safety services, prior to performing their duties.

16. The PSWAC ISC definition of Public Safety Services is too restrictive. If fails to recognize that Public Safety/Safety-of-Life services are provided by entities not related to, or requiring prior specific authorization from, a governmental authority whose primary mission is in providing public safety services.

17. The PSWAC ISC definition also goes counter to the PSWAC Charter. The PSWAC Charter mandates the maximizing of interoperability between Federal, state, and local public safety entities. By defining Public Safety Services/Providers as those only related to or authorized by a Public Safety governmental entity, interoperability communications becomes significantly restricted, hampers the prompt rendition and delivery of medical/emergency services and is therefore not in the public interest.

18. It is strongly recommended that the PSWAC ISC definition be modified to better conform with the PSWAC Charter and the Commission's definition of who constitutes a Public Safety/Safety-of-Life authority/entity by the removal from the definitions any reference to the requirement that such entities be "properly authorized by the appropriate governmental authority" whose primary mission is providing/to support public safety services (Attachment B). Only in this manner can the PSWAC Charter mandate of maximizing interoperability communications between the many types of emergency providers in safety-of-life situations be achieved.

Respectfully submitted,


Dr. Michael C. Trahos, D.O., NCE, CET

V.

FOOTNOTES

- 1/ DEFINITION OF PUBLIC SAFETY/PUBLIC SERVICES, PSWAC/ISC 95-12-051/3 12/14/95, ISC revised and approved 12/14/95, Steering Committee approved 12/15/95.
- 2/ CHARTER, Public Safety Wireless Advisory Committee, June 26, 1995, Section B.
- 3/ Ibid.
- 4/ DEFINITION OF PUBLIC SAFETY/PUBLIC SERVICES, PSWAC/ISC 95-12-051/3, December 14, 1995.
- 5/ Ibid.
- 6/ NOTICE OF PROPOSED RULE MAKING, GN Docket No. 87-112, 2 FCC Rcd at 2869, at paragraph 6.
- 7/ MEMORANDUM OPINION AND ORDER, PR Docket No. 91-72, FCC 96-11, at paragraph 19.
- 8/ REPORT AND ORDER, GN Docket Nos. 84-1231, 84-1233 & 84-1234, 2 FCC Rcd 1825 (1986).
- 9/ REPORT AND ORDER, GN Docket No. 87-112, FCC 87-359, at paragraphs 12 and 13.
- 10/ NOTICE OF PROPOSED RULE MAKING, GN Docket No. 87-14, FCC 87-45, at paragraph 10.
- 11/ REPORT AND ORDER, GN Docket No. 87-14, FCC 88-266, at paragraph 43.
- 12/ NOTICE OF PROPOSED RULE MAKING, PR Docket 89-552, FCC 89-327, in general.
- 13/ REPORT AND ORDER, PR Docket No. 89-552, FCC 91-74, at paragraph 24 - 28.
- 14/ PETITION FOR RECONSIDERATION, PR Docket No. 89-552, Dr. Michael C. Trahos, May 15, 1991; PUBLIC NOTICE, Report No. 1848, June 5, 1991.
- 15/ MEMORANDUM OPINION AND ORDER, PR Docket No. 89-552, FCC 92-261, at paragraph 38.

- 16/ NOTICE OR PROPOSED RULE MAKING, PR Docket No. 91-72,
6 FCC Rcd 2017 (1991).
- 17/ PETITION FOR RECONSIDERATION, PR Docket No. 91-72,
Dr. Michael C. Trahos, April 2, 1993; PUBLIC NOTICE,
Report No. 1936, April 27, 1993.
- 18/ REPLY, PR Docket No. 91-72, IMSA/IAFC, June 4, 1993,
at page 16.
- 19/ REPLY COMMENTS, PR Docket No. 91-71, Dr. Michael C. Trahos,
June 14, 1993.
- 20/ MEMORANDUM OPINION AND ORDER, PR Docket No. 91-72, FCC 96-11,
at paragraph 23.

VI.

ATTACHMENT A

PSWAC/ISC 95-12-051/3 (12/14/95)
Revised and approved by ISC (12/14/95)
Approved by Steering Committee (12/15/95)

DEFINITION OF PUBLIC SAFETY/PUBLIC SERVICES

Public Safety: The public's right, exercised through Federal, State or Local government as prescribed by law, to protect and preserve life, property, and natural resources and to serve the public welfare.

Public Safety Services: Those services rendered by or through Federal, State, or Local government entities in support of public safety duties.

Public Safety Services Provider: Governmental and public entities or those non-governmental, private organizations, which are properly authorized by the appropriate governmental authority whose primary mission is providing public safety services.

Public Safety Support Provider: Governmental and public entities or those non-governmental, private organizations which provide essential public services that are properly authorized by the appropriate governmental authority whose mission is to support public safety services. This support may be provided either directly to the public or in support of public safety services providers.

Public Services: Those services provided by non-public safety entities that furnish, maintain, and protect the nation's basic infrastructures which are required to promote the public's safety and welfare.

VII.

ATTACHMENT B

PROPOSED

DEFINITION OF PUBLIC SAFETY/PUBLIC SERVICES

Public Safety: The public's right, exercised through Federal, State or Local government as prescribed by law, to protect and preserve life, property, and natural resources and to serve the public welfare.

Public Safety Services: Those services tendered by or through Federal, State, or Local entities in support of public safety duties.

Public Safety Services Provider: Governmental and public entities or those non-governmental, private individuals or organizations, which are providing public safety services.

Public Safety Support Provider: Governmental and public entities or those non-governmental, private individuals or organizations which provide essential public services to support public safety services. This support may be provided either directly to the public or in support of public safety services providers.

Public Services: Those services provided by non-public safety entities that furnish, maintain, and protect the nation's basic infrastructure which are required to promote the public's safety and welfare.

VIII.

ATTACHMENT C

CHARTER

A. Committee's Official Designation

Public Safety Wireless Advisory Committee.

The establishment of this Committee is in response to the provisions of Title VI of the Omnibus Budget Reconciliation Act of 1993 and, more specifically, to reflect the desires of the House Appropriations Committee's Subcommittee on Commerce, Justice, and State, the Judiciary and Related Agencies that the FCC and NTIA coordinate closely with the public safety community in planning for future spectrum needs.

B. Committee's Objectives and Scope of Activity

The function of the Advisory Committee is to provide advice and recommendations to the Chairman, Federal Communications Commission (FCC) and the Administrator, National Telecommunications and Information Administration (NTIA) on operational, technical, and spectrum requirements of Federal, state, and local public safety entities through the year 2010. In addition, it will serve to advise the FCC and NTIA of opportunities for improved spectrum utilization and efficiency and facilitate a negotiated rulemaking at the FCC regarding public safety spectrum, and the development and implementation of plans at NTIA regarding Federal public safety spectrum policy. Membership for the Committee will be solicited from public safety organizations, entities and manufacturers and members will serve as representatives of organizations and not as experts serving in an individual capacity. The Advisory Committee will:

- Advise the FCC and NTIA of specific operational wireless needs of the community including improvement of basic voice, data and E911 services, and the implementation of new wide-area, broadband telecommunications technologies for transmission of mugshots, fingerprints, video, and other high speed data.
- Advise the NTIA and FCC on options to provide for greater interoperability among Federal, state, and local public safety entities.
- Advise the FCC and NTIA on options to accommodate growth of basic and emerging services, including bandwidth vs. functional requirement trade-offs, technical options, and other options.
- Advise the NTIA and FCC on the total spectrum requirements for the operational needs referred to above, including frequency band options, shared/joint spectrum use options, and other options.

C. Period of Time Necessary for the Committee to Carry Out its Purposes

The Committee will submit a report to the FCC and NTIA within the scope outlined in Part B above within 12 months of the first formal meeting. All business of the Committee will be completed within a two-year period.

D. Officials to Whom the Committee Reports

Chairman, FCC
Administrator, NTIA

E. Agencies Responsible for Providing Necessary Support to the Committee

The Federal Communications Commission
The National Telecommunications and Information Administration

F. Description of Duties for Which Committee is Responsible

The duties of the Committee will be to gather information and prepare technical analyses and recommendations concerning the matters listed in Part B above and provide them to the FCC and NTIA. The committee will function solely as an advisory body under the Federal Advisory Committee Act, 5 U.S.C. App2.

G. Estimated Annual Operating Costs in FTEs and Dollars

The estimated annual staff time is two FTEs for FCC and two FTEs for NTIA. The estimated annual operating costs for support services provided to the Committee are \$25,000.00, to be shared equally by NTIA and FCC.

H. Estimated Number and Frequency of Meetings

The Committee is expected to meet at least two times per year, and at such other intervals as the Committee decides.

I. Termination Date

The Committee would terminate no later than June 26, 1997.

J. Date Charter is Filed

June 26, 1995.

ATTACHMENT B

PRESIDENT (CY '94)
ALEXANDRIA MEDICAL SOCIETY, INC.

CLINICAL INSTRUCTOR
GEORGETOWN UNIVERSITY SCHOOL OF MEDICINE

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Washington, DC 20554

In the Matter of)	
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Public Safety Wireless Advisory)	WTB-1
Committee (PSWAC);)	
Interoperability Subcommittee:)	
)	PSWAC/ISC/WG-3 96-04-01 (Rev 6a)
Baseline Technology of Inter-)	
operability; National Calling)	
and Tactical Channels)	

COMMENTS

Submitted by:

Dr. Michael C. Trahos, D.O., NCE, CET
4600 King Street, Suite 4E
Alexandria, Virginia 22302-1213

July 10, 1996



PRESIDENT (CY '94)
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Interoperability Subcommittee:) PSWAC/ISC/WG-3 96-04-01 (Rev 6a)
Baseline Technology for Inter-)
operability; National Calling)
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COMMENTS

Submitted by:

Dr. Michael C. Trahos, D.O., NCE, CET
4600 King Street, Suite 4E
Alexandria, Virginia 22302-1213

July 10, 1996

I. INTRODUCTION

1. Dr. Michael C. Trahos, D.O., NCE, CET (Commenter), pursuant to the Federal Communications Commission's (Commission) co-sponsored Public Safety Wireless Advisory Committee (PSWAC) (C-ID #2016) Charter, hereby submits these Comments in response to the PSWAC's Interoperability Subcommittee (ISC) Working Group 3 (WG-3) Revision 6a (96-04-01) regarding the issues of "Baseline Technology for Interoperability" and National Calling and Tactical Channels.

II.

COMMENTS

2. The ISC/WG-3 has strongly recommended that the Commission mandate a current **analog** and future **digital** "Baseline Technology for Interoperability" standard. It has proposed that the analog standard be universally expressed as emission designator 16K0F3E.

3. However, an emission designator is actually the sum of two different components, an emission type (see 47 CFR 90.207) and an emission bandwidth (see 47 CFR 90.209). Since emission bandwidths are different for the various public-safety frequency bands, it is more appropriate that the ISC's request for an interoperability standard be expressed in the form of the emission type plus emission bandwidth, allowing the Commission to determine the specific emission designator for each frequency band.

4. Therefore, it is proposed that sections 1.4.2 and 7.5.2 subparagraphs be condensed and re-written as follows (changes underlined):

"It is the recommendation of the Interoperability Subcommittee that the minimum "Analog Baseline Technology for interoperability" for unit-to-unit voice communications shall have an Emission Type of F3E (47 CFR 2.201) and a maximum Emission Bandwidth pursuant to 47 CFR 90.209, as amended, for each applicable public safety band between 25 MHz and 869 MHz. This mandatory requirement should be adopted as soon as possible by the FCC and NTIA.

5. The above single subparagraph substitution for the three subparagraphs of sections 1.4.2 and 7.5.2 eliminates any ambiguity and redundancy that exists in the current draft text and summates the issue into a single concise paragraph. Though subparagraph two of the above draft sections addresses the issue of future further implementation of narrowband FM requirements, the Commission had recently modified 47 CFR 90.209, mandating the future implementation of additional narrowbanding (see Report and Order, PR Docket No. 92-235, FCC 95-255, June 15, 1995, Appendix F, Page F-100). Therefore, draft text subparagraph two of the above sections is redundant and unnecessary.

6. The ISC/WG-3 proposes, in draft section 1.4.6, that "[a] "National Calling Channel" and one or more "Tactical Channels must be established in EACH of the public safety frequency bands. Use of these channel these channels should be similar to that currently designated in the NPSPAC plan (FCC §90.xxx)". Though this commenter is in concurrence with this proposal, the cross reference to the NPSPAC plan is obsolete.

7. In December, 1986, the Commission established the National Public Safety Planning Advisory Committee (NPSPAC). NPSPAC issued their Initial Report in March, 1987 and a Final